

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

BRAVETTE JOHNSON AND
CURTIS WILLIAMS,

Plaintiffs,

v.

Civil Action No. 3:17-cv-00553-MHL

CITY OF RICHMOND, VIRGINIA,
ET AL,

Defendants.

DEFENDANT JASON NORTON'S
RULE 12(B)(6) MOTION TO DISMISS THE COMPLAINT

NOW COMES Defendant Jason Norton (“Norton”), by counsel, pursuant to Federal Rule of Civil Procedure 12(b)(6), and moves this Court to dismiss, with prejudice, the Complaint (ECF Doc. 1) filed against him in its entirety as it fails to state any claim upon which relief can be granted under either 42 U.S.C. § 1983 or the common law of Virginia, and fails to allege facts sufficient to establish a legally cognizable cause of action. Norton relies upon and incorporates his Brief in Support of the Motion to Dismiss the Complaint as if fully set forth herein.

JASON NORTON

By Counsel

/s/

David P. Corrigan

VSb No. 26341

Jeremy D. Capps

VSb No. 43909

M. Scott Fisher, Jr.

VSb No. 78485

Attorney for Jason Norton
Harman, Claytor, Corrigan & Wellman
P.O. Box 70280
Richmond, Virginia 23255
804-747-5200 - Phone
804-747-6085 – Fax
dcorrigan@hccw.com
jcapps@hccw.com
sfisher@hccw.com

CERTIFICATE

I hereby certify that on the 6th day of October 2017, I filed a copy of the foregoing document with the Clerk of the Court using the CM/ECF system, which will automatically send a Notice of Electronic Filing to all counsel of record.

/s/

David P. Corrigan
VSB No. 26341
Attorney for Jason Norton
Harman, Claytor, Corrigan & Wellman
P.O. Box 70280
Richmond, Virginia 23255
804-747-5200 - Phone
804-747-6085 - Fax
dcorrigan@hccw.com